

ACCOUNTING OF DISCLOSURES CHECKLIST TOOL

PURPOSE: This tool is to provide you with a checklist of those disclosures for which you do and do not have to account.

I. ACCOUNT for the following disclosures:

- A. Made to MO Department of Health and Senior Services for public health reporting (i.e. for mandatory disease reporting, etc).
- B. Made to health oversight agencies, such as
 - i. State Auditor
 - ii. JCAHO
 - iii. ICF-MR surveyors
 - iv. Medicare (CMS).
- C. For judicial or administrative proceedings (i.e. responding to court orders, court testimony, PABs, guardianships, etc).
- D. Made for research purposes (unless you have an authorization).
- E. Made to Worker's Compensation (does not apply to DMH employees, but does apply to client workers).
- F. Made to avert serious threats to health or safety (i.e. Tarasoff warnings or duty to warn).
- G. Made for organ, eye or tissue donations.
- H. Made to funeral homes, coroners, or medical examiners.
- I. Made to respond to abuse, neglect or domestic violence issues.
- J. If made to provide information to law enforcement related to Chapter 552 RSMo clients, or to law enforcement regarding crime in the facility.

II. NO ACCOUNTING Required for the following disclosures:

- A. Made for treatment, payment or health care operations (i.e. to private hospitals for treatment referrals; or disclosures for payment purposes).
- B. Made to the consumer (or guardian, or parent if a minor).
- C. Made for national security or intelligence needs, or for protective services of the President (i.e. Department of Homeland Security, FBI, Secret Service, etc.).
- D. Made pursuant to a valid authorization.
- E. Made to law enforcement (i.e. for reporting missing persons or providing information on suspects or fugitives; responding to grand jury subpoena; or in response to a warrant), or made to correctional institutions.
- F. Made prior to April 14, 2003.
- G. For any incidental disclosures (i.e. if someone overhears a conversation while walking by the area, etc.).
- H. Disclosures made as part of a limited data set.